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July 20, 2011

**VIA ECF**

Hon. Kiyo A. Matsumoto  
United States District Court, EDNY  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Andrew Russo, *et al*  
Indictment # 11 CR 30 (KAM)

Dear Judge Matsumoto;

I represent Defendant Ali Jusenioski in the captioned Indictment, pursuant to an appointment under the Criminal Justice Act. Mr. Jusenioski has entered a guilty plea before Your Honor, pursuant to an agreement, and remains at liberty until sentencing.

Mr. Jusenioski respectfully seeks Court permission to attend a baptismal party next Saturday, July 30, from 6:30 PM until approximately 12:00 AM, at the Rex Manor in Bensonhurst. He is not under restraint, and can travel freely within the EDNY, but the party is hosted by a co-defendant, Giovanni Galluzzo, and the child's godfather, Roger Califano, will be in attendance. Both of those gentlemen are co-defendants in this case, with whom the defendant is not permitted to associate without counsel present or Court permission, and thus Your Honor's permission is required.

I have discussed the matter with PreTrial Services, which agency has no objection, as the defendant has been fully compliant with the conditions of his release.

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AUSA Elizabeth Geddes has advised me that the Government does not consent to Mr. Jusenioski's attendance at the celebration, as he is not a family member, but a close friend. Nonetheless, I respectfully request that the Court permit my client to attend this celebration. The defendants have met together on prior occasions, during co-defendant meetings. Since the defendants have all entered guilty pleas in this case, no possibility of "collusion" exists, and I can frankly see no harm in allowing the families to celebrate such a joyous occasion. Should anything untoward occur, the defendant has yet to be sentenced and any such conduct on his part would no doubt be brought to the Court's attention at that time.

Thank you for your courtesy and consideration.

Respectfully yours,

**/s/ JOHN S. WALLENSTEIN**

JOHN S. WALLENSTEIN

JSW/hs

cc: AUSA Elizabeth Geddes (via ECF)